

1 **FEDERAL ELECTION COMMISSION**

2 **FIRST GENERAL COUNSEL'S REPORT**

3 **MUR 7477**

4 COMPLAINT FILED: Aug. 10, 2018

5 NOTIFICATION DATE: Aug. 14, 2018

6 LAST RESPONSE FILED: N/A

7 ACTIVATION DATE: Oct. 24, 2018

8
9 **STATUTE OF LIMITATIONS:**

10 Jan. 1, 2016 – Aug. 15, 2023

11 **ELECTION CYCLES:** 2012, 2014, 2016, 2018

12 **COMPLAINANT:** Hamilton County Democratic Party

13 **RESPONDENTS:** Steve Chabot
14 Steve Chabot for Congress and James Schwartz in
15 his official capacity as treasurer
16 WinNovember Political Action Committee and
17 Stacy Barton in her official capacity as treasurer
18 Right Turn Design, LLC
19 Kevin Bischof

20 **RELEVANT AUTHORITY:** 52 U.S.C. § 30114(b)
21 11 C.F.R. § 113.1(g)

22 **INTERNAL REPORTS CHECKED:** Disclosure Reports

23 **FEDERAL AGENCIES CHECKED:** None

24 **I. INTRODUCTION**

25 The Complaint in this matter alleges that Congressman Steve Chabot, his authorized
26 campaign committee, Steve Chabot for Congress and James Schwartz in his official capacity as
27 treasurer (the "Chabot Committee"), and his leadership PAC, WinNovember Political Action
28 Committee and Stacy Barton in her official capacity as treasurer ("WinNovember"),¹ converted
29 campaign funds to personal use. According to the Complaint, the committees made payments

¹ A leadership PAC is a political committee that is directly or indirectly established, financed, maintained or controlled by a federal candidate or officeholder, but which is not an authorized campaign committee and is not affiliated with an authorized campaign committee. 52 U.S.C. § 30104(i)(8)(B); 11 C.F.R. § 100.5(e)(6).

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1 above fair market value for services provided by Right Turn Design, LLC ("RTD"), a company
2 owned and operated by Chabot's son-in-law, Kevin Bischof. None of the Respondents filed a
3 Response in this matter.

4 As explained fully below, the available information does not raise a reasonable inference
5 that the payments to RTD resulted in the conversion of campaign funds to personal use — *i.e.*,
6 that RTD failed to provide *bona fide* services or that the payments for RTD's services were
7 above fair market value. We therefore recommend that the Commission dismiss the allegations
8 that Chabot, the Chabot Committee, WinNovember, RTD, and Bischof violated 52 U.S.C.
9 § 30114(b), and close the file.

10 II. FACTUAL BACKGROUND

11 Congressman Steve Chabot is a federal candidate and officeholder in Ohio's First
12 Congressional District, which he has represented since 1995. According to a news article
13 published in *USA Today* ("*USA Today* article"), which is cited by the Complainant, Chabot's
14 son-in-law Kevin Bischof formed RTD in 2010 to provide web and media services for
15 conservative-oriented campaigns and organizations.² Beginning on January 1, 2011, the Chabot
16 Committee started making regular, incremental payments to RTD that were, according to the
17 committee's disclosure reports, for web design and internet-related consulting services.³
18 WinNovember began paying RTD for similar services on April 23, 2012. RTD also received
19 payments from two other committees during the 2012 election cycle. In sum, during the 2012

² See Compl. at 2 (Aug. 10, 2018) (citing Deirdre Shesgreen, "Rep. Steve Chabot's Campaign Has Paid Son-in-law's Firm More Than \$150,000 For Web Consulting," USA TODAY (Nov. 3, 2017), available at <https://www.usatoday.com/story/news/politics/2017/11/03/rep-steve-chabots-campaign-has-paid-son-in-laws-firm-more-than-150-000-web-consulting/827734001>). According to the article, Bischof married Chabot's daughter in 2006.

³ See Chabot Cmte. Amend. 2011 April Quarterly Report at 45 (July 12, 2011).

1 cycle, RTD received total payments of \$29,320.98 from the Chabot Committee, \$10,104.14 from
2 WinNovember, \$8,650 from Steve Austria for Congress, and \$3,632.90 from Moore for
3 Congress.⁴

4 RTD continued receiving regular, incremental payments from the Chabot Committee and
5 WinNovember during the 2014 and 2016 election cycles, but no other federal committees made
6 payments to RTD after the 2012 election cycle. During the 2014 election cycle, RTD received
7 payments totaling \$34,020 from the Chabot Committee and \$10,350 from WinNovember.⁵
8 During the 2016 election cycle, RTD received payments totaling \$55,655.80 from the Chabot
9 Committee and \$3,000 from WinNovember.⁶ During the 2018 election cycle, RTD received
10 payments totaling \$27,960 from the Chabot Committee, and no disbursements from
11 WinNovember.⁷ Overall, RTD received payments totaling \$146,956.78 from the Chabot
12 Committee between January 2011 and August 2018, and \$23,454.14 from WinNovember
13 between April 2012 and June 2015, which indicates that during the time period that each
14 committee made any payments to the company, RTD received monthly average amounts of

⁴ All Disbursements to RTD, 2011-2012, https://www.fec.gov/data/disbursements/?two_year_transaction_period=2012&data_type=processed&recipient_name=Right+Turn+Design&min_date=01%2F01%2F2011&max_date=12%2F31%2F2012.

⁵ All Disbursements to RTD, 2013-2014, https://www.fec.gov/data/disbursements/?two_year_transaction_period=2014&data_type=processed&recipient_name=Right+Turn+Design&min_date=01%2F01%2F2013&max_date=12%2F31%2F2014.

⁶ All Disbursements to RTD, 2015-2016, https://www.fec.gov/data/disbursements/?two_year_transaction_period=2016&data_type=processed&recipient_name=Right+Turn+Design&min_date=01%2F01%2F2015&max_date=12%2F31%2F2016.

⁷ All Disbursements to RTD, 2017-2018, https://www.fec.gov/data/disbursements/?two_year_transaction_period=2018&data_type=processed&recipient_name=Right+Turn+Design&min_date=01%2F01%2F2017&max_date=11%2F02%2F2018.

1 \$1,749.49 from the Chabot Committee and \$617.21 from WinNovember. RTD received a
2 combined total of \$170,410.92 from these two federal committees linked to Chabot.⁸

3 The Complaint alleges that the payments to RTD were in excess of the fair market value
4 for the services that RTD provided to the Chabot Committee and WinNovember, and thus
5 resulted in the conversion of campaign funds to personal use.⁹ According to the *USA Today*
6 article, web design consultants concluded that the Chabot Committee's website is "fine from a
7 technical standpoint" but is "outdated and a bit clunky."¹⁰ One such expert noted that the
8 website "looks like it was designed 5 or 10 years ago. It's your plain, boring site from 2010[.]"¹¹
9 WinNovember's current website does not appear to be active given that it only contains the
10 statement: "Coming Soon."¹² However, in a blog post dated July 18, 2012, which appeared on
11 his campaign committee's website, Chabot urged supporters to make contributions to
12 WinNovember through its website.¹³ WinNovember's website thus appears to have been
13 operational at some point.

14 Although the Respondents did not file a Response in this matter, in the *USA Today*
15 article, Jamie Schwartz, a "longtime Chabot campaign advisor" and the Chabot Committee's

⁸ See Disbursement Chart, Attach. 2.

⁹ Compl. at 1.

¹⁰ *USA Today* Article.

¹¹ *Id.*

¹² See WinNovember Website, available at <http://winnovember.com>.

¹³ "WinNovember" Blog Post (July 18, 2012), available at <https://stevechabot.com/blog/winnovember>. In this blog post, Chabot writes: "The number of races we will be able to make a difference in, will be determined by the support we receive from people like yourself. I would appreciate it, and I would strongly encourage you, to click here to go to the WinNovember website. You can read more there about WinNovember, see some of the candidates we've contributed to so far, and make a secure online contribution if you are willing to help." *Id.* (linking to <http://winnovember.com>).

1 treasurer, indicated that RTD was hired to provide the web consulting services because of
2 Bischof's technical expertise and experience.¹⁴ Schwartz also commented that Bischof's firm
3 has redesigned the Chabot Committee's website four times and "does a gamut of work" for the
4 campaign, "from fending off cyberattacks to maintaining the congressman's email list."¹⁵
5 Bischof also provided a statement for the article indicating that he has worked in "the web
6 design/development business for 17 years" and has two companies, RTD and Bischof Design,
7 using the latter for the majority of his work for private-sector clients.¹⁶ Bischof Design was
8 registered as a trade name in Ohio by RTD on March 8, 2011, with a "Date of First Use" of
9 February 1, 2011, and Bischof signed the registration filing; that registration lapsed after its
10 initial five-year term ended on March 8, 2016.¹⁷

11 **III. FACTUAL AND LEGAL ANALYSIS**

12 **A. A Candidate May Use Campaign Funds to Pay a Family Member, at Fair**
13 **Market Value, for *Bona Fide* Services Provided to His or Her Campaign**

14 The Federal Election Campaign Act of 1971, as amended (the "Act"), provides that funds
15 in a campaign account may be used for expenditures arising from a candidate's campaign for
16 federal office or a federal officeholder's official duties, as well as for "any other lawful purpose"
17 not otherwise prohibited under the Act.¹⁸ Notwithstanding this broad discretion, however, the

¹⁴ *USA Today* Article.

¹⁵ *Id.*

¹⁶ *Id.*

¹⁷ State of Ohio, Certificate of Registration of Trade Name 2003735, Bischof Design (March 8, 2011); State of Ohio, Certificate of Cancellation of Trade Name 2003735, Bischof Design (Mar. 17, 2016).

¹⁸ 52 U.S.C. § 30114(a).

1 Act prohibits any person from converting a political contribution or donation to personal use.¹⁹
2 Personal use is defined as “any use of funds in a campaign account of a present or former
3 candidate to fulfill a commitment, obligation or expense of any person that would exist
4 irrespective of the candidate’s campaign or duties as a Federal officeholder.”²⁰ Commission
5 regulations list the uses of campaign funds that are considered *per se* personal use, including
6 “[s]alary payments to a member of the candidate’s family, unless the family member is providing
7 *bona fide* services to the campaign.”²¹ If a member of the candidate’s family is providing *bona*
8 *fide* services to the candidate’s campaign, he or she must be paid the fair market value for such
9 services at the time, as any payment in excess of the fair market value is personal use.²²

10 In prior enforcement matters, the Commission has dismissed allegations that campaign
11 payments to a family member resulted in personal use where the allegations relied on
12 unsubstantiated assumptions regarding the services that the family member provided. In MUR
13 6864, the Commission found that a federal candidate had not converted campaign funds to
14 personal use by hiring his wife as the campaign manager and treasurer for his authorized
15 campaign committee, and paying her a monthly salary between \$300 and \$500.²³ The
16 Commission concluded that contrary to the Complaint’s allegation that the committee was
17 “virtually nonexistent,” the committee had received *bona fide* services from the candidate’s wife,

¹⁹ 52 U.S.C. § 30114(b).

²⁰ 11 C.F.R. § 113.1(g); *see* 52 U.S.C. § 30114(b)(2).

²¹ 11 C.F.R. § 113.1(g)(1)(i)(H). A candidate’s son-in-law is a member of the candidate’s family for the purposes of the personal use prohibition. *See* 11 C.F.R. § 113.1(g)(7)(iii).

²² 11 C.F.R. § 113.1(g)(1)(i)(H).

²³ Factual and Legal Analysis at 5, MUR 6864 (Ruiz III for Congress, *et al.*) (finding no reason to believe); *see* First Gen. Counsel’s Rpt., MUR 6864 (recommending no reason to believe finding).

1 and that available information indicated that the monthly payments to her did not exceed the fair
2 market value for the services she provided.²⁴ Similarly, in MUR 6631, the Commission
3 dismissed personal use allegations stemming from political consulting services provided by a
4 federal candidate's brother, noting that the Complainant's assertion that the services provided
5 were limited to "voter persuasion efforts" was unsupported, and the candidate represented that
6 his brother provided "general strategic consulting advice on a wide range of political matters."²⁵

7 The Commission has also, in the advisory opinion context, approved a federal candidate's
8 proposal to hire his wife and pay her a salary as a campaign staffer, stating that Commission
9 "regulations specifically permit salary payments to family members where they are payments for
10 'bona fide, campaign related services.'"²⁶ The Commission cautioned that in keeping with the
11 "requirement to pay family members no more than the fair market value of *bona fide* services,"
12 the candidate's wife's service contract should conform to standard terms and industry practices.
13 Beyond this general requirement, the Commission determined that "no special obligation is
14 imposed by the Act or Commission regulations."²⁷

15 **B. Respondents' Payments to Right Turn Design Do Not Appear to Constitute**
16 **Personal Use**

17 The available information does not support a reasonable inference that the services RTD
18 provided the Chabot Committee were not *bona fide*, or that the payments to RTD were above the

²⁴ Factual and Legal Analysis at 5, MUR 6864.

²⁵ Factual and Legal Analysis at 8, MUR 6631 (Berman, *et al.*) (dismissing allegations); *see* First Gen. Counsel's Rpt., MUR 6631 (recommending dismissal of allegations).

²⁶ Advisory Op. 2001-10 at 3 (Jesse L. Jackson, Jr. for Congress) (emphasis in original) (quoting 11 C.F.R. § 113.1(g)(1)(i)(H)).

²⁷ Advisory Op. 2001-10 at 3.

1 fair market value for the services provided. The Complaint contends that the payments to RTD
2 were excessive for the services provided because of the “high, cumulative value” of the
3 payments, the Chabot Committee website’s “antiquated design,” and RTD’s lack of other
4 political clients.²⁸ But upon closer inspection, these factors do not support a reasonable
5 inference that the payments to RTD constituted personal use.

6 First, the Complaint’s assertion that the market rate for the “development and
7 maintenance of a similar site” would be \$120,000 less than what the Chabot Committee paid
8 RTD is unsupported; the Complaint bases this claim on a “reasonable good faith estimate” but
9 does not provide any supporting information.²⁹ The Complaint also focuses on the aggregate
10 amount that the Chabot Committee paid to RTD, but disregards the fact that this overall amount
11 — \$146,956.78 — was paid in smaller, incremental amounts over four election cycles.³⁰ For
12 instance, during the 2012 cycle, the Chabot Committee made 18 payments to RTD ranging from
13 \$1,000 to \$4,560 for “web consulting” or “web design consulting.” These payments continued
14 during the 2014 cycle, when the Chabot Committee made 24 payments to RTD ranging between
15 \$1,100 and \$3,420, and 17 of the payments were for the same amount, \$1,140.

16 During the 2016 cycle, likewise, the Chabot Committee made 26 payments to RTD
17 ranging between \$1,630 and \$6,037.90, and 20 of the payments were for an amount between
18 \$1,630 and \$1,680.³¹ Finally, during the 2018 election cycle through August 2018, the Chabot
19 Committee made 16 payments to RTD, all but two of which fell between \$1,630 and \$1,680.

²⁸ Compl. at 3.

²⁹ *Id.*

³⁰ See Disbursement Chart, Attach. 2.

³¹ See *id.*

1 The overall monthly average of the Chabot Committee's payments to RTD is only \$1,749.49.
2 This pattern of 84 small payments — many of which were for very similar amounts — made
3 over an extended period from January 2011 to August 2018, generally undermines the
4 Complaint's allegation that that the aggregate amount paid was "in vast excess of fair market
5 value" and thus supposedly indicative of personal use.³²

6 Second, the allegedly "antiquated design" of the Chabot Committee's website does not
7 support the conclusion that RTD did not provide *bona fide* services or was overpaid for its work.
8 The personal use rule regarding salary payments to family members asks whether the services
9 provided were *bona fide*, not whether they produced a high-quality result. A subjective
10 assessment of the website's quality does not offer relevant insight into the value of the services
11 that RTD provided, particularly since the Chabot Committee publicly represented that RTD did
12 more than just design the Chabot Committee's website. In the *USA Today* article, Schwartz, the
13 Chabot Committee's treasurer, represented not only that RTD redesigned the website multiple
14 times, but also that the company has performed a variety of other work for the committee,
15 including work related to cybersecurity and maintaining an email list.³³ Nothing in the available
16 record contradicts or undermines those representations.

17 Third, the contention that RTD lacks political clients aside from the Chabot Committee is
18 factually inaccurate. While RTD *currently* has no other political clients, during the 2012 election
19 cycle — the first cycle that it was active — two other federal committees hired the company:
20 (1) Steve Austria for Congress, which made 21 payments totaling \$8,650 for "web maintenance"

³² Compl. at 1.

³³ See *USA Today* Article.

1 and "internet maintenance," and (2) Moore for Congress, which made three payments totaling
2 \$3,632.90 for its "website."³⁴ That all of RTD's political business now appears to come from the
3 Chabot Committee does not support a personal use violation without a showing that the
4 Committee was not paying for *bona fide* campaign-related services or that such payments were
5 above fair market value.³⁵

6 With respect to WinNovember, there is insufficient information suggesting that RTD
7 failed to provide *bona fide* services to the leadership PAC, or that WinNovember's payments
8 were above the market rate for such services.³⁶ Although WinNovember's website does not
9 appear to be operational at present, WinNovember only made payments to RTD during the 2012,
10 2014, and 2016 cycles; it has not made any payments to RTD during the 2018 election cycle.
11 Moreover, based on Chabot's 2012 blog post soliciting contributions for WinNovember, its
12 website appears to have been operational in the past. Aside from the information concerning

³⁴ See Disbursement Chart, Attach. 2.

³⁵ While Bischof acknowledged in the *USA Today* article that RTD currently has no other political clients, he indicated that he has worked in the web design and development field for 17 years, and that the majority of his business comes from private-sector clients through his other company, Bischof Design. While there is little publicly available information to corroborate Bischof's statements, and Bischof did not respond to the Complaint, his asserted professional experience undercuts the allegations. During the Notice and Comment period for the Commission's personal use rules, some commentators urged the Commission to prohibit the use of campaign funds to make salary payments to any family member "unless the family member was hired to perform services that he or she previously provided in a professional capacity outside the campaign." Contribution and Expenditure Limitations and Prohibitions: Personal Use of Campaign Funds, 60 Fed. Reg. 7,862, 7,866 (Feb. 9, 1995). Although the Commission rejected that stricter approach in adopting its final rule, which treats a candidate's family members like any other campaign employees, *see id.*, it is worth noting that even under the stricter approach, Bischof could have been hired without violating the personal use rule if, as he claims, he worked as a professional web designer before he was hired to provide such services to the Chabot-linked committees. *See USA Today* Article.

³⁶ While the plain language of the Act and Commission regulations indicate that the personal use prohibition applies to funds in a "campaign" account, *see* 52 U.S.C. § 30114(b) and 11 C.F.R. § 113.1(g), the Commission has been divided as to whether the prohibition applies to funds in a leadership PAC account. *See, e.g.,* Advisory Op. 2014-06 (Ryan for Congress) at 8 ("The Commission could not agree by the necessary four votes whether [the leadership PAC] can place more promotional content on its website and social media sites at more than *de minimis* cost because the Commission could not agree as to the legal basis for that conclusion, with three Commissioners holding the position that the Act's personal use prohibition does not apply to leadership PACs.")

1 WinNovember's current website, nothing else in the record indicates that the committee's
2 payments to RTD were improper, and over the 38-month period it made any payments to RTD,
3 WinNovember paid an average monthly amount of only \$617.21.

4 While certain aspects of the record are suggestive, the overall record does not raise a
5 reasonable inference that RTD's services were not *bona fide* or that it received more than the fair
6 market value for its services. First, although it initially had two other clients unconnected to
7 Chabot, Bischof's firm received payments from only the two Chabot-linked committees after the
8 2012 election cycle. However, even if RTD received additional, ongoing business from the
9 Chabot committees because of Bischof's family connection to Chabot, the Act permits a
10 candidate to hire his or her family members and pay them using campaign funds if the family
11 member provides *bona fide* services at a fair market rate. Second, the purportedly lackluster
12 quality of the Chabot Committee's website could be read to suggest that the payments to RTD
13 were excessive for the quality of the work provided, but the assessment of the Chabot
14 Committee's website is subjective and, in any event, other information indicates that RTD
15 provided additional services beyond designing the website. Third, because the Respondents did
16 not file a Response, they have not addressed the Complaint's allegations before the Commission.
17 Nonetheless, although Bischof's and Schwartz's representations in the *USA Today* article do not
18 carry the weight of a Response or a sworn statement provided to the Commission, they are part
19 of the available record and offer an explanation of the business relationship between RTD and
20 the Chabot committees.

21 As such, the overall record, viewed as a whole, does not raise a reasonable inference that
22 the payments to RTD resulted in the conversion of campaign funds to personal use. Under these
23 circumstances, therefore, we recommend that the Commission dismiss the allegations that

1 Chabot, the Chabot Committee, WinNovember, RTD, and Bischof violated 52 U.S.C.
2 § 30114(b), and close the file.

3 **IV. RECOMMENDATIONS**

- 4 1. Dismiss the allegations that Steve Chabot, Steve Chabot for Congress and James
5 Schwartz in his official capacity as treasurer, WinNovember Political Action
6 Committee and Stacy Barton in her official capacity as treasurer, Right Turn
7 Design, LLC, and Kevin Bischof violated 52 U.S.C. § 30114(b);
- 8 2. Approve the attached Factual and Legal Analysis;
- 9 3. Approve the appropriate letters; and
- 10 4. Close the file.

11 Lisa J. Stevenson
12 Acting General Counsel

13 Charles Kitcher
14 Acting Associate General Counsel
15 for Enforcement
16

17 March 29, 2019
18 Date

19 Peter Blumberg by Jt
20 Peter Blumberg
Acting Deputy Associate General Counsel
for Enforcement

21 Jim Lee
22 Jim Lee
23 Acting Assistant General Counsel

24 Saurav Ghosh
25 Saurav Ghosh
26 Attorney

27 Attachments:
28 Factual and Legal Analysis
29 Disbursement Chart

1 **FEDERAL ELECTION COMMISSION**

2 **FACTUAL AND LEGAL ANALYSIS**

3 RESPONDENTS: Steve Chabot MUR 7477
4 Steve Chabot for Congress and
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6 capacity as treasurer
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13 **I. INTRODUCTION**

14 This matter was generated by a complaint filed with the Federal Election Commission
15 (“Commission”) by the Hamilton County Democratic Party. *See* 52 U.S.C. § 30109(a)(1). The
16 Complaint alleges that Congressman Steve Chabot, his authorized campaign committee, Steve
17 Chabot for Congress and James Schwartz in his official capacity as treasurer (the “Chabot
18 Committee”), and his leadership PAC, WinNovember Political Action Committee and Stacy
19 Barton in her official capacity as treasurer (“WinNovember”),¹ converted campaign funds to
20 personal use. According to the Complaint, the committees made payments above fair market
21 value for services provided by Right Turn Design, LLC (“RTD”), a company owned and
22 operated by Chabot’s son-in-law, Kevin Bischof. None of the Respondents filed a Response in
23 this matter.

24 As explained fully below, the available information does not raise a reasonable inference
25 that the payments to RTD resulted in the conversion of campaign funds to personal use — *i.e.*,
26 that RTD failed to provide *bona fide* services or that the payments for RTD’s services were

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1 above fair market value. The Commission therefore dismisses the allegations that Chabot, the
2 Chabot Committee, WinNovember, RTD, and Bischof violated 52 U.S.C. § 30114(b).

3 **II. FACTUAL AND LEGAL ANALYSIS**

4 **A. Background**

5 Congressman Steve Chabot is a federal candidate and officeholder in Ohio's First
6 Congressional District, which he has represented since 1995. According to a news article
7 published in *USA Today* ("*USA Today* article"), which is cited by the Complainant, Chabot's
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7 operational at some point.

8 Although the Respondents did not file a Response in this matter, in the *USA Today*
9 article, Jamie Schwartz, a “longtime Chabot campaign advisor” and the Chabot Committee’s
10 treasurer, indicated that RTD was hired to provide the web consulting services because of
11 Bischof’s technical expertise and experience.¹⁴ Schwartz also commented that Bischof’s firm
12 has redesigned the Chabot Committee’s website four times and “does a gamut of work” for the
13 campaign, “from fending off cyberattacks to maintaining the congressman’s email list.”¹⁵
14 Bischof also provided a statement for the article indicating that he has worked in “the web
15 design/development business for 17 years” and has two companies, RTD and Bischof Design,

¹⁰ *USA Today* Article.

¹¹ *Id.*

¹² See WinNovember Website, available at <http://winnovember.com>.

¹³ “WinNovember” Blog Post (July 18, 2012), available at <https://stevechabot.com/blog/winnovember>. In this blog post, Chabot writes: “The number of races we will be able to make a difference in, will be determined by the support we receive from people like yourself. I would appreciate it, and I would strongly encourage you, to click here to go to the WinNovember website. You can read more there about WinNovember, see some of the candidates we’ve contributed to so far, and make a secure online contribution if you are willing to help.” *Id.* (linking to <http://winnovember.com>).

¹⁴ *USA Today* Article.

¹⁵ *Id.*

1 using the latter for the majority of his work for private-sector clients.¹⁶ Bischof Design was
2 registered as a trade name in Ohio by RTD on March 8, 2011, with a “Date of First Use” of
3 February 1, 2011, and Bischof signed the registration filing; that registration lapsed after its
4 initial five-year term ended on March 8, 2016.¹⁷

5 **B. A Candidate May Use Campaign Funds to Pay a Family Member, at Fair**
6 **Market Value, for *Bona Fide* Services Provided to His or Her Campaign**

7 The Federal Election Campaign Act of 1971, as amended (the “Act”), provides that funds
8 in a campaign account may be used for expenditures arising from a candidate’s campaign for
9 federal office or a federal officeholder’s official duties, as well as for “any other lawful purpose”
10 not otherwise prohibited under the Act.¹⁸ Notwithstanding this broad discretion, however, the
11 Act prohibits any person from converting a political contribution or donation to personal use.¹⁹
12 Personal use is defined as “any use of funds in a campaign account of a present or former
13 candidate to fulfill a commitment, obligation or expense of any person that would exist
14 irrespective of the candidate’s campaign or duties as a Federal officeholder.”²⁰ Commission
15 regulations list the uses of campaign funds that are considered *per se* personal use, including
16 “[s]alary payments to a member of the candidate’s family, unless the family member is providing
17 *bona fide* services to the campaign.”²¹ If a member of the candidate’s family is providing *bona*

¹⁶ *Id.*

¹⁷ State of Ohio, Certificate of Registration of Trade Name 2003735, Bischof Design (March 8, 2011); State of Ohio, Certificate of Cancellation of Trade Name 2003735, Bischof Design (Mar. 17, 2016).

¹⁸ 52 U.S.C. § 30114(a).

¹⁹ 52 U.S.C. § 30114(b).

²⁰ 11 C.F.R. § 113.1(g); *see* 52 U.S.C. § 30114(b)(2).

²¹ 11 C.F.R. § 113.1(g)(1)(i)(H). A candidate’s son-in-law is a member of the candidate’s family for the purposes of the personal use prohibition. *See* 11 C.F.R. § 113.1(g)(7)(iii).

1 *fide* services to the candidate's campaign, he or she must be paid the fair market value for such
2 services at the time, as any payment in excess of the fair market value is personal use.²²

3 In prior enforcement matters, the Commission has dismissed allegations that campaign
4 payments to family members resulted in personal use where the allegations relied on
5 unsubstantiated assumptions regarding the services that the family member provided. In MUR
6 6864, the Commission found that a federal candidate had not converted campaign funds to
7 personal use by hiring his wife as the campaign manager and treasurer for his authorized
8 campaign committee, and paying her a monthly salary between \$300 and \$500.²³ The
9 Commission concluded that contrary to the Complaint's allegation that the committee was
10 "virtually nonexistent," the committee had received *bona fide* services from the candidate's wife,
11 and that available information indicated that the monthly payments to her did not exceed the fair
12 market value for the services she provided.²⁴ Similarly, in MUR 6631, the Commission
13 dismissed personal use allegations stemming from political consulting services provided by a
14 federal candidate's brother, noting that the Complainant's assertion that the services provided
15 were limited to "voter persuasion efforts" was unsupported, and the candidate represented that
16 his brother provided "general strategic consulting advice on a wide range of political matters."²⁵

17 The Commission has also, in the advisory opinion context, approved a federal candidate's
18 proposal to hire his wife and pay her a salary as a campaign staffer, stating that Commission

²² 11 C.F.R. § 113.1(g)(1)(i)(H).

²³ Factual and Legal Analysis at 5, MUR 6864 (Ruiz III for Congress, *et al.*) (finding no reason to believe);
see First Gen. Counsel's Rpt., MUR 6864 (recommending no reason to believe finding).

²⁴ Factual and Legal Analysis at 5, MUR 6864.

²⁵ Factual and Legal Analysis at 8, MUR 6631 (Berman, *et al.*) (dismissing allegations); *see* First Gen.
Counsel's Rpt., MUR 6631 (recommending dismissal of allegations).

1 “regulations specifically permit salary payments to family members where they are payments for
2 ‘*bona fide*, campaign related services.’”²⁶ The Commission cautioned that in keeping with the
3 “requirement to pay family members no more than the fair market value of *bona fide* services,”
4 the candidate’s wife’s service contract should conform to standard terms and industry practices.
5 Beyond this general requirement, the Commission determined that “no special obligation is
6 imposed by the Act or Commission regulations.”²⁷

7 **C. Respondents’ Payments to Right Turn Design Do Not Appear to Constitute**
8 **Personal Use**

9 The available information does not support a reasonable inference that the services RTD
10 provided the Chabot Committee were not *bona fide*, or that the payments to RTD were above the
11 fair market value for the services provided. The Complaint contends that the payments to RTD
12 were excessive for the services provided because of the “high, cumulative value” of the
13 payments, the Chabot Committee website’s “antiquated design,” and RTD’s lack of other
14 political clients.²⁸ But upon closer inspection, these factors do not support a reasonable
15 inference that the payments to RTD constituted personal use.

16 First, the Complaint’s assertion that the market rate for the “development and
17 maintenance of a similar site” would be \$120,000 less than what the Chabot Committee paid
18 RTD is unsupported; the Complaint bases this claim on a “reasonable good faith estimate” but
19 does not provide any supporting information.²⁹ The Complaint also focuses on the aggregate

²⁶ Advisory Op. 2001-10 at 3 (Jesse L. Jackson, Jr. for Congress) (emphasis in original) (quoting 11 C.F.R. § 113.1(g)(1)(i)(H)).

²⁷ *Id.*

²⁸ Compl. at 3.

²⁹ *Id.*

1 amount paid to RTD, but disregards the fact that this overall amount — \$146,956.78 — was paid
2 in smaller, incremental amounts over four election cycles.³⁰ For instance, during the 2012 cycle,
3 the Chabot Committee made 18 payments to RTD ranging from \$1,000 to \$4,560 for “web
4 consulting” or “web design consulting.” These payments continued during the 2014 cycle, when
5 the Chabot Committee made 24 payments to RTD ranging between \$1,100 and \$3,420, and 17 of
6 the payments were for the same amount, \$1,140.

7 During the 2016 cycle, likewise, the Chabot Committee made 26 payments to RTD
8 ranging between \$1,630 and \$6,037.90, and 20 of the payments were for an amount between
9 \$1,630 and \$1,680.³¹ Finally, during the 2018 election cycle through August 2018, the Chabot
10 Committee made 16 payments to RTD, all but two of which fell between \$1,630 and \$1,680.
11 The overall monthly average of the Chabot Committee’s payments to RTD is only \$1,749.49.
12 This pattern of 84 small payments — many of which were for very similar amounts — made
13 over an extended period from January 2011 to August 2018, generally undermines the
14 Complaint’s allegation that that the aggregate amount paid was “in vast excess of fair market
15 value” and thus supposedly indicative of personal use.³²

16 Second, the allegedly “antiquated design” of the Chabot Committee’s website does not
17 support the conclusion that RTD did not provide *bona fide* services or was overpaid for its work.
18 The personal use rule regarding salary payments to family members asks whether the services
19 provided were *bona fide*, not whether they produced a high-quality result. A subjective
20 assessment of the website’s quality does not offer relevant insight into the value of the services

³⁰ See Disbursement Chart, Attach. 2.

³¹ See *id.*

³² Compl. at 1.

1 that RTD provided, particularly since the Chabot Committee publicly represented that RTD did
2 more than just design the Chabot Committee's website. In the *USA Today* article, Schwartz, the
3 Chabot Committee's treasurer, represented not only that RTD redesigned the website multiple
4 times, but also that the company has performed a variety of other work for the committee,
5 including work related to cybersecurity and maintaining an email list.³³ Nothing in the available
6 record contradicts or undermines those representations.

7 Third, the contention that RTD lacks political clients aside from the Chabot Committee is
8 factually inaccurate. While RTD *currently* has no other political clients, during the 2012 election
9 cycle — the first cycle that it was active — two other federal committees hired the company:
10 (1) Steve Austria for Congress, which made 21 payments totaling \$8,650 for “web maintenance”
11 and “internet maintenance,” and (2) Moore for Congress, which made three payments totaling
12 \$3,632.90 for its “website.”³⁴ That all of RTD's political business now appears to come from the
13 Chabot Committee does not support a personal use violation without a showing that the
14 Committee was not paying for *bona fide* campaign-related services or that such payments were
15 above fair market value.³⁵

³³ See *USA Today* Article.

³⁴ See Disbursement Chart, Attach. 2.

³⁵ While Bischof acknowledged in the *USA Today* article that RTD currently has no other political clients, he indicated that he has worked in the web design and development field for 17 years, and that the majority of his business comes from private-sector clients through his other company, Bischof Design. While there is little publicly available information to corroborate Bischof's statements, and Bischof did not respond to the Complaint, his asserted professional experience undercuts the allegations. During the Notice and Comment period for the Commission's personal use rules, some commentators urged the Commission to prohibit the use of campaign funds to make salary payments to any family member “unless the family member was hired to perform services that he or she previously provided in a professional capacity outside the campaign.” Contribution and Expenditure Limitations and Prohibitions: Personal Use of Campaign Funds, 60 Fed. Reg. 7862, 7866 (Feb. 9, 1995). Although the Commission rejected that stricter approach in adopting its final rule, which treats a candidate's family members like any other campaign employees, *see id.*, it is worth noting that even under the stricter approach, Bischof could have been hired without violating the personal use rule if, as he claims, he worked as a professional web designer before he was hired to provide such services to the Chabot-linked committees. See *USA Today* Article.

1 With respect to WinNovember, there is insufficient information suggesting that RTD
2 failed to provide *bona fide* services to the leadership PAC, or that WinNovember's payments
3 were above the market rate for such services.³⁶ Although WinNovember's website does not
4 appear to be operational at present, WinNovember only made payments to RTD during the 2012,
5 2014, and 2016 cycles; it has not made any payments to RTD during the 2018 election cycle.
6 Moreover, based on Chabot's 2012 blog post soliciting contributions for WinNovember, its
7 website appears to have been operational in the past. Aside from the information concerning
8 WinNovember's current website, nothing else in the record indicates that the committee's
9 payments to RTD were improper, and over the 38-month period it made any payments to RTD,
10 WinNovember paid an average monthly amount of only \$617.21.

11 While certain aspects of the record are suggestive, the overall record does not raise a
12 reasonable inference that RTD's services were not *bona fide* or that it received more than the fair
13 market value for its services. First, although it initially had two other clients unconnected to
14 Chabot, Bischof's firm only received payments from the two Chabot-linked committees after the
15 2012 election cycle. However, even if RTD received additional, ongoing business from the
16 Chabot committees because of Bischof's family connection to Chabot, the Act permits a
17 candidate to hire his or her family members and pay them using campaign funds if the family
18 member provides *bona fide* services at a fair market rate. Second, the purportedly lackluster
19 quality of the Chabot Committee's website could be read to suggest that the payments to RTD

³⁶ While the plain language of the Act and Commission regulations indicate that the personal use prohibition applies to funds in a "campaign" account, *see* 52 U.S.C. § 30114(b) and 11 C.F.R. § 113.1(g), the Commission has been divided as to whether the prohibition applies to funds in a leadership PAC account. *See, e.g.,* Advisory Op. 2014-06 (Ryan for Congress) at 8 ("The Commission could not agree by the necessary four votes whether [the leadership PAC] can place more promotional content on its website and social media sites at more than *de minimis* cost because the Commission could not agree as to the legal basis for that conclusion, with three Commissioners holding the position that the Act's personal use prohibition does not apply to leadership PACs.").

1 were excessive for the quality of the work provided, but the assessment of the Chabot
2 Committee's website is subjective and, in any event, other information indicates that RTD
3 provided additional services beyond designing the website. Third, because the Respondents did
4 not file a Response, they have not addressed the Complaint's allegations before the Commission.
5 Nonetheless, although Bischof's and Schwartz's representations in the *USA Today* article do not
6 carry the weight of a Response or a sworn statement provided to the Commission, they are part
7 of the available record and offer an explanation of the business relationship between RTD and
8 the Chabot committees.

9 As such, the overall record, viewed as a whole, does not raise a reasonable inference that
10 the payments to RTD resulted in the conversion of campaign funds to personal use. Under these
11 circumstances, therefore, the Commission dismisses the allegations that Chabot, the Chabot
12 Committee, WinNovember, RTD, and Bischof violated 52 U.S.C. § 30114(b).

2012 Election Cycle, Disbursements to RTD, Chronological by Committee

Committee	Disbursement Purpose	Date	Amount
MOORE FOR CONGRESS	WEBSITE	2/9/2012	\$807.90
MOORE FOR CONGRESS	WEBSITE	3/12/2012	\$990.00
MOORE FOR CONGRESS	WEBSITE	5/15/2012	\$1,835.00
STEVE AUSTRIA FOR CONGRESS	WEB MAINTENANCE	4/15/2011	\$620.00
STEVE AUSTRIA FOR CONGRESS	WEB MAINTENANCE	5/12/2011	\$350.00
STEVE AUSTRIA FOR CONGRESS	INTERNET MAINTENANCE	6/9/2011	\$350.00
STEVE AUSTRIA FOR CONGRESS	INTERNET MAINTENANCE	7/8/2011	\$350.00
STEVE AUSTRIA FOR CONGRESS	INTERNET MAINTENANCE	8/11/2011	\$350.00
STEVE AUSTRIA FOR CONGRESS	INTERNET MAINTENANCE	9/8/2011	\$350.00
STEVE AUSTRIA FOR CONGRESS	INTERNET MAINTENANCE	10/5/2011	\$350.00
STEVE AUSTRIA FOR CONGRESS	INTERNET MAINTENANCE	11/9/2011	\$350.00
STEVE AUSTRIA FOR CONGRESS	INTERNET MAINTENANCE	12/19/2011	\$410.00
STEVE AUSTRIA FOR CONGRESS	INTERNET MAINTENANCE	1/2/2012	\$410.00
STEVE AUSTRIA FOR CONGRESS	INTERNET MAINTENANCE	2/6/2012	\$410.00
STEVE AUSTRIA FOR CONGRESS	INTERNET MAINTENANCE	3/1/2012	\$410.00
STEVE AUSTRIA FOR CONGRESS	INTERNET MAINTENANCE	4/2/2012	\$410.00
STEVE AUSTRIA FOR CONGRESS	INTERNET MAINTENANCE	5/4/2012	\$410.00
STEVE AUSTRIA FOR CONGRESS	INTERNET MAINTENANCE	6/4/2012	\$820.00
STEVE AUSTRIA FOR CONGRESS	INTERNET MAINTENANCE	7/9/2012	\$330.00
STEVE AUSTRIA FOR CONGRESS	INTERNET MAINTENANCE	8/6/2012	\$330.00
STEVE AUSTRIA FOR CONGRESS	INTERNET MAINTENANCE	9/5/2012	\$410.00
STEVE AUSTRIA FOR CONGRESS	INTERNET MAINTENANCE	10/4/2012	\$410.00
STEVE AUSTRIA FOR CONGRESS	INTERNET MAINTENANCE	11/5/2012	\$410.00
STEVE AUSTRIA FOR CONGRESS	INTERNET MAINTENANCE	12/3/2012	\$410.00
CHABOT COMMITTEE	WEB DESIGN CONSULTING	1/1/2011	\$2,500.00
CHABOT COMMITTEE	WEB DESIGN CONSULTING	1/31/2011	\$2,500.00
CHABOT COMMITTEE	WEB DESIGN CONSULTING	3/2/2011	\$1,000.00
CHABOT COMMITTEE	WEB CONSULTING	4/20/2011	\$2,000.00
CHABOT COMMITTEE	WEB CONSULTING	7/2/2011	\$2,000.00
CHABOT COMMITTEE	WEB DESIGN CONSULTING	7/12/2011	\$1,000.00
CHABOT COMMITTEE	WEB DESIGN CONSULTING	8/15/2011	\$1,000.00
CHABOT COMMITTEE	WEB DESIGN CONSULTING	9/2/2011	\$1,000.00
CHABOT COMMITTEE	WEB DESIGN CONSULTING	9/25/2011	\$1,000.00
CHABOT COMMITTEE	WEB CONSULTING	11/3/2011	\$2,019.98
CHABOT COMMITTEE	WEB CONSULTING	1/1/2012	\$1,000.00

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CHABOT COMMITTEE	WEB CONSULTING	3/8/2012	\$2,000.00
CHABOT COMMITTEE	WEB CONSULTING	4/15/2012	\$1,140.00
CHABOT COMMITTEE	WEB CONSULTING	5/17/2012	\$1,140.00
CHABOT COMMITTEE	ONLINE CONSULTING FEE	9/16/2012	\$4,560.00
CHABOT COMMITTEE	ON-LINE CONSULTANTING	10/12/2012	\$1,140.00
CHABOT COMMITTEE	ON-LINE CONSULTING	11/16/2012	\$1,181.00
CHABOT COMMITTEE	ON-LINE CONSULTING	12/14/2012	\$1,140.00
WINNOVEMBER	LOGO DESIGN	4/23/2012	\$400.00
WINNOVEMBER	SSL CERTIFICATE	4/23/2012	\$399.00
WINNOVEMBER	SECURE WEB HOSTING	5/7/2012	\$159.68
WINNOVEMBER	DOMAIN NAME PURCHASE	5/7/2012	\$123.31
WINNOVEMBER	INTERNET CONSULTING - APR	5/15/2012	\$1,000.00
WINNOVEMBER	INTERNET CONSULTING - MAY	5/15/2012	\$1,000.00
WINNOVEMBER	INTERNET CONSULTING - JUNE	6/30/2012	\$1,000.00
WINNOVEMBER	ONLINE FUNDRAISING FEE	7/25/2012	\$2.78
WINNOVEMBER	ONLINE FUNDRAISING FEE	7/25/2012	\$1.62
WINNOVEMBER	ONLINE FUNDRAISING FEE	7/26/2012	\$7.55
WINNOVEMBER	INTERNET CONSULTING - JUL	8/1/2012	\$1,000.00
WINNOVEMBER	INTERNET CONSULTING - AUG	8/7/2012	\$1,000.00
WINNOVEMBER	ONLINE FUNDRAISING FEE	8/23/2012	\$3.50
WINNOVEMBER	ONLINE FUNDRAISING FEE	8/24/2012	\$3.20
WINNOVEMBER	ONLINE FUNDRAISING FEE	8/24/2012	\$1.75
WINNOVEMBER	ONLINE FUNDRAISING FEE	9/4/2012	\$1.75
WINNOVEMBER	INTERNET CONSULTING - SEP	9/30/2012	\$1,000.00
WINNOVEMBER	INTERNET CONSULTING - OCT	10/9/2012	\$1,000.00
WINNOVEMBER	WEB PAGE CONSULTING	11/15/2012	\$1,000.00
WINNOVEMBER	INTERNET CONSUTLING - DEC	12/10/2012	\$1,000.00

2014 Election Cycle, Disbursements to RTD, Chronological by Committee

Committee	Disbursement Purpose	Date	Amount
CHABOT COMMITTEE	WEB DESIGN CONSUTLTING	1/9/2013	\$1,140.00
CHABOT COMMITTEE	WEB DESIGN CONSULTING	2/22/2013	\$1,140.00
CHABOT COMMITTEE	WEB DESIGN	4/5/2013	\$1,140.00
CHABOT COMMITTEE	ON-LINE CONSULTING FEE	4/29/2013	\$3,420.00
CHABOT COMMITTEE	ON-LINE CONSULTING	5/18/2013	\$1,140.00
CHABOT COMMITTEE	ON-LINE CONSULTING	6/4/2013	\$1,100.00
CHABOT COMMITTEE	ON-LINE CONSULTING	6/28/2013	\$2,280.00
CHABOT COMMITTEE	ON-LINE CONSUTLTING	7/13/2013	\$2,280.00
CHABOT COMMITTEE	ON-LINE CONSULTING	8/13/2013	\$1,140.00
CHABOT COMMITTEE	ON-LINE CONSUTLING	9/17/2013	\$1,140.00
CHABOT COMMITTEE	ON-LINE CONSULTING	10/12/2013	\$1,140.00
CHABOT COMMITTEE	ON-LINE CONSULTING	11/13/2013	\$1,140.00
CHABOT COMMITTEE	ON-LINE CONSULTING	12/18/2013	\$1,140.00
CHABOT COMMITTEE	ON-LINE CONSULTING	12/18/2013	\$1,140.00
CHABOT COMMITTEE	ON-LINE CONSULTING	1/15/2014	\$1,140.00
CHABOT COMMITTEE	ON-LINE CONSULTING	2/15/2014	\$1,140.00
CHABOT COMMITTEE	ON-LINE CONSULTING	3/16/2014	\$1,140.00
CHABOT COMMITTEE	ON-LINE CONSULTING	4/25/2014	\$1,140.00
CHABOT COMMITTEE	ON-LINE CONSULTING	5/24/2014	\$1,140.00
CHABOT COMMITTEE	ON-LINE CONSULTING	6/2/2014	\$1,140.00
CHABOT COMMITTEE	ON-LINE CONSULTING	7/15/2014	\$2,280.00
CHABOT COMMITTEE	ON-LINE CONSULTING	9/9/2014	\$1,140.00
CHABOT COMMITTEE	ON-LINE CONSULTING	11/7/2014	\$1,640.00
CHABOT COMMITTEE	ONLINE CONSULTING	12/7/2014	\$1,640.00
WINNOVEMBER	ONLINE PAYMENT SERVICES - REISSUE	7/31/2013	\$850.00
WINNOVEMBER	INTERNET CONSULTING - MAY REISSUE	7/31/2013	\$1,000.00
WINNOVEMBER	INTERNET CONSULTING - JUN	7/31/2013	\$1,000.00
WINNOVEMBER	INTERNET CONSULTING - JUL	7/31/2013	\$1,000.00
WINNOVEMBER	INTERNET CONSULTING - JAN	1/31/2014	\$1,000.00
WINNOVEMBER	INTERNET CONSULTING FEB-APR	3/31/2014	\$2,000.00
WINNOVEMBER	INTERNET CONSULTING - JUN	6/30/2014	\$500.00
WINNOVEMBER	INTERNET CONSULTING - MAY	6/30/2014	\$500.00
WINNOVEMBER	INTERNET CONSULTING - APR	6/30/2014	\$1,000.00
WINNOVEMBER	INTERNET CONSULTING - OCT	10/30/2014	\$500.00
WINNOVEMBER	INTERNET CONSULTING (DEC)	12/31/2014	\$500.00
WINNOVEMBER	INTERNET CONSULTING (NOV)	12/31/2014	\$500.00

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2016 Election Cycle, Disbursements to RTD, Chronological by Committee

Committee	Disbursement Purpose	Date	Amount
CHABOT COMMITTEE	ONLINE CONSULTING	2/6/2015	\$4,920.00
CHABOT COMMITTEE	ONLINE CONSULTING	3/3/2015	\$1,640.00
CHABOT COMMITTEE	ONLIN CONSULTING	4/14/2015	\$1,640.00
CHABOT COMMITTEE	ONLINE CONSULTING	5/26/2015	\$1,640.00
CHABOT COMMITTEE	ONLINE CONSULTING	6/1/2015	\$4,247.90
CHABOT COMMITTEE	ONLINE CONSULTING	6/11/2015	\$1,640.00
CHABOT COMMITTEE	ONLINE CONSULTING	7/2/2015	\$6,037.90
CHABOT COMMITTEE	ONLINE CONSULTING	8/14/2015	\$1,640.00
CHABOT COMMITTEE	ON-LINE CONSULTING	12/14/2015	\$1,630.00
CHABOT COMMITTEE	ON-LINE CONSULTING	12/21/2015	\$1,640.00
CHABOT COMMITTEE	ON-LINE CONSULTING	1/15/2016	\$1,630.00
CHABOT COMMITTEE	ON-LINE CONSULTING	2/29/2016	\$3,260.00
CHABOT COMMITTEE	ON-LINE CONSULTING	3/2/2016	\$1,630.00
CHABOT COMMITTEE	ON-LINE CONSULTING	3/9/2016	\$1,700.00
CHABOT COMMITTEE	ON-LINE CONSULTING	4/6/2016	\$1,630.00
CHABOT COMMITTEE	ON-LINE CONSULTING	5/3/2016	\$1,630.00
CHABOT COMMITTEE	ON-LINE CONSULTING	5/3/2016	\$1,630.00
CHABOT COMMITTEE	ON-LINE CONSULTING	6/1/2016	\$1,630.00
CHABOT COMMITTEE	ON-LINE CONSULTING	7/15/2016	\$1,630.00
CHABOT COMMITTEE	ON-LINE CONSULTING	7/26/2016	\$1,630.00
CHABOT COMMITTEE	ON-LINE CONSULTING	8/4/2016	\$2,630.00
CHABOT COMMITTEE	ON-LINE CONSULTING	9/2/2016	\$1,680.00
CHABOT COMMITTEE	ON-LINE CONSULTING	10/5/2016	\$1,680.00
CHABOT COMMITTEE	ON-LINE CONSULTING	10/31/2016	\$1,680.00
CHABOT COMMITTEE	ON-LINE CONSULTING	11/14/2016	\$1,680.00
CHABOT COMMITTEE	ON-LINE CONSULTING	12/12/2016	\$1,630.00
WINNOVEMBER	INTERNET CONSULTING (JAN)	1/31/2015	\$500.00
WINNOVEMBER	INTERNET CONSULTING (JUN)	6/30/2015	\$500.00
WINNOVEMBER	INTERNET CONSULTING (MAY)	6/30/2015	\$500.00
WINNOVEMBER	INTERNET CONSULTING (MAR)	6/30/2015	\$500.00
WINNOVEMBER	INTERNET CONSULTING (FEB)	6/30/2015	\$500.00
WINNOVEMBER	INTERNET CONSULTING (APR)	6/30/2015	\$500.00

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2018 Election Cycle, Disbursements to RTD, Chronological by Committee

Committee	Disbursement Purpose	Date	Amount
CHABOT COMMITTEE	ON-LINE CONSULTING	1/6/2017	\$1,630.00
CHABOT COMMITTEE	ON-LINE CONSULTING	2/8/2017	\$3,310.00
CHABOT COMMITTEE	ON-LINE CONSULTING	3/8/2017	\$1,630.00
CHABOT COMMITTEE	ON-LINE CONSULTING	5/1/2017	\$1,630.00
CHABOT COMMITTEE	ON-LINE CONSULTING	6/1/2017	\$1,630.00
CHABOT COMMITTEE	ON-LINE CONSULTING	9/1/2017	\$1,680.00
CHABOT COMMITTEE	ON-LINE CONSULTING	10/1/2017	\$1,680.00
CHABOT COMMITTEE	ON-LINE CONSULTING	10/13/2017	\$1,680.00
CHABOT COMMITTEE	ON-LINE CONSULTING	12/1/2017	\$1,680.00
CHABOT COMMITTEE	ON-LINE CONSULTING	2/20/2018	\$1,680.00
CHABOT COMMITTEE	ON-LINE CONSULTING	4/2/2018	\$1,630.00
CHABOT COMMITTEE	ON-LINE CONSULTING	4/23/2018	\$1,580.00
CHABOT COMMITTEE	ON-LINE CONSULTING	5/21/2018	\$1,630.00
CHABOT COMMITTEE	ON-LINE CONSULTING	7/1/2018	\$1,630.00
CHABOT COMMITTEE	ON-LINE CONSULTING	7/20/2018	\$1,630.00
CHABOT COMMITTEE	ON-LINE CONSULTING	8/15/2018	\$1,630.00

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